

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

LORENA BALDELAMAR,)	
)	
Plaintiff,)	
)	
)	Civil Action
v.)	
)	NO. 4:15-cv-00209-HLM-WEJ
JEFFERSON SOUTHERN)	
CORPORATION,)	
)	
Defendant.)	
_____)	

DECLARATION OF PAOLA CORONEL

My name is Paola Coronel and I am over the age of majority, I am competent to testify, and I am giving this statement based upon my personal knowledge.

1. I have been employed by Jefferson Southern Corporation ("Jefferson Southern") since October 17, 2013. I work in the position of Human Resources Coordinator.
2. In my position I periodically walk through the Stamping Department and talk with production employees. I also encounter production employees in the breakroom and in the Human Resources office. During my employment,

I became familiar with an employee named Lorena Baldelamar who worked in the Stamping Department. I often engaged in conversation with Baldelamar when I would see her.

3. I never observed any employee sexually harassing Baldelamar. Baldelamar also never told me that she was being sexually harassed until July 22, 2015, when she had been called to the Human Resources office following a co-worker's complaint about her.
4. I am fluent in English and Spanish. On occasion, I have been asked to help translate conversations with employees who speak Spanish as their primary language. On July 22, 2015, Baldelamar asked if I would help translate her conversation with Marcus Smith. I also helped translate Baldelamar's subsequent conversation with Demetria Strozier on July 28, 2015.
5. During my employment, I have communicated with Baldelamar in both English and Spanish. Baldelamar has never asked me to translate any written Jefferson Southern policy.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 17th day of July, 2016.

A handwritten signature in black ink, appearing to read "Paola Coronel", written over a horizontal line.

Paola Coronel